

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

Linda Tirado,

Case No. 20-CV-01338 (JRT/JFD)

Plaintiff,

vs.

**DECLARATION OF KRISTIN SARFF**

City of Minneapolis; Minneapolis Chief of  
Police Medaria Arradondo, *in his official  
capacity*; Robert Kroll, *in his individual  
capacity*; and Minneapolis Police  
Department Officers John Does 1-4, *in  
their official and individual capacities*,

Defendants.

---

Your Declarant is Kristin R. Sarff, and she submits the following declaration on behalf of the Defendant City of Minneapolis:

1. I am an Assistant City Attorney with the Minneapolis City Attorney's Office. I am one of the attorneys assigned to represent the Defendant City of Minneapolis in this matter. I submit this declaration in opposition to the Plaintiff's motion for leave to amend to file the proposed Second Amended Complaint.

2. Attached as Exhibit A is a true and correct copy of email correspondence from Plaintiff's counsel, dated February 2, 2022.

3. Attached as Exhibit B is a true and correct copy of the first version of a redlined copy of the Proposed Second Amended Complaint provided to the City's counsel, along with the February 2, 2022, attached as Exhibit A.

4. Attached as Exhibit C is a true and correct copy of correspondence from the City of Minneapolis' counsel to Plaintiff's counsel, dated February 3, 2022.

5. Attached as Exhibit D is a true and correct copy of correspondence from Plaintiff's counsel to the City of Minneapolis' counsel, dated February 3, 2022.

6. Attached as Exhibit E is a true and correct copy of correspondence from Plaintiff's counsel to the City of Minneapolis' counsel, dated February 3, 2022.

7. Attached as Exhibit F is a true and correct copy of the second version of the Plaintiff's proposed Second Amended Complaint that was sent to the City of Minneapolis' counsel

I declare under penalty of perjury that everything I have stated in this document is true and correct. Signed in Hennepin County, Minnesota.

Dated: February 10, 2022

/s Kristin R. Sarff  
Kristin R. Sarff